

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

JOHN L. STINSON, JR., SHARIKA)	
HORTON, NATHANIEL RAY)	
JOHNSON, HELEN MARIE)	
SCHLUETER, individually and)	CIVIL ACTION NO.
behalf of other similarly situated)	1:22-cv-01342-TWT
individuals,)	
)	
Plaintiffs,)	
)	
v.)	
)	
LOCKHEED MARTIN)	
CORPORATION)	
)	
Defendant.)	

**AMENDED JOINT MOTION
TO APPROVE SETTLEMENT AGREEMENT**

John L. Stinson, Jr., Sharika Horton, Nathaniel Ray Johnson, Helen Marie Schlueter (together “Named Plaintiffs”), on behalf of themselves and the forty-four (44) individuals who have opted into this action jointly with Lockheed Martin Company hereby file this amended motion respectfully requesting the Court’s approval of the settlement of the matter. Through this joint motion, the parties request that the Court (1) approve the proposed settlement as a fair, reasonable, and adequate resolution of a bona fide dispute; (2) approve the terms of the settlement and distribution of payments for back wages and liquidated set forth in the parties’ Settlement Agreement; and (3) dismiss the case with prejudice. Plaintiffs, with the

consent of Defendant, further request that the Court (A) approve the attorneys' fees and costs requested; and (B) approve the award to Plaintiff Stinson for his agreement to reasonably cooperate with Defendant with regard to the enforcement of the present Settlement Agreement and Release should Defendant request his cooperation.

Respectfully submitted this 10th day of May, 2023.

/s/Douglas R. Kertscher

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Counsel for Defendant

CERTIFICATE OF COMPLIANCE

Pursuant to Local Rule 7.1, I hereby certify that the foregoing document has been prepared using 14-point Times New Roman font and that it has been formatted in compliance with Local Rule 5.1(B).

Respectfully submitted this 10th day of May, 2023.

/s/Douglas R. Kertscher
Douglas R. Kertscher
Counsel for Plaintiffs

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CERTIFICATE OF SERVICE

I hereby certify that on May 10, 2023, I electronically filed the foregoing
AMENDED JOINT MOTION TO APPROVE SETTLEMENT AGREEMENT
with the Clerk of the Court using the CM/ECF system which will automatically send
email notification of such filing to all counsel of record.

/s/Douglas R. Kertscher
Douglas R. Kertscher
Counsel for Plaintiffs